ASH GROVE CEMENT COMPANY

"WESTERN REGION"

June 3, 1997

Mr. Fred Austin,
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notice of Construction No 6708

Dear Mr. Austin:

In your May 13, 1997 letter you requested further information regarding the above NOC.

- The reference to 40 CFR 60, Appendix A, Method 18 on page 3 of the April 17, 1997 letter is actually a reference to the table "Conversion Factor for Concentration" in Method 19 section 2.

- During preheat, Ash Grove will convert actual measured stack flow to DSCFM as per normal operations. This is to say that the flow rate currently displayed (in DSCFM) in the control room will be used by the operator to monitor flow rate. The moisture content used will be the same as mill off conditions which is 9%.

- The table " Startup January 27-29, 1997" included in April 17, 1997 letter refers to DAS PPMC and Logger PPMC. These labels describe comparative data from RADAS 2 SO2 analyzer recorded by the Data Acquisition Server (DAS). The data logger refers to data from the Lear Siegler SO2 analyzer recorded by a Fluke Hydra Data Bucket Model 2635A.

- The Lear Siegler SO2 analyzer was calibrated to the 1000 ppm range by Instrument Electrician Duane Vaughn on 1/27 prior to kiln preheat with 853 ppm SO2 span gas. Calibration checks were conducted by Mr. Vaughn on 1/28 and 1/29 using the span gas of .176 ppm to confirm linearity. The unit read the calibration gas closely (+/- 5 ppm).

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- Ash Grove prefers not to use the Lear Siegler SO2 analyzer to monitor stack concentration during preheat but rather demonstrate through an alternate method with a broad safety margin that current emissions limits would not be exceeded. The use of the Lear Siegler SO2 analyzer would not be continuous since preheat is associated only with process startup. Kiln preheats are infrequent, usually unscheduled and avoided as much as possible. As such , the Lear Siegler analyzer would be idle more than 90% of the time and yet require the same amount of maintenance and daily calibration as the RADAS 2 analyzer regularly used to monitor the process. In addition, the use of this unit would be accompanied by installation complexities needed to connect the added monitor to the DAS and control room, extra data acquisition hardware and software changes needed to accurately differentiate, record and report analyzer calibrations and plant process data . This would pose an ongoing potential for errors due to incompatibility, logistic and operational problems.

If you have any questions, please contact me at 623-5596 x221.

Yours truly,

Gerald J. Brown
Manager, Safety and Environmental

cc: HV